

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 05-421-01 (Gardner, J.)</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b>
<b>NASHAWN OMAR LAW</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 924(a)(1)(A) (making a false statement to a federal firearms licensee - 41 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 922(a)(1)(A) (dealing in firearms without a license- 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 922(a)(1)(A) (transporting firearms without a license - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 922(g)(1) (convicted felon in possession of a firearm - 30 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 922(k) (possession of a firearm with an obliterated serial number - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 922(u) (theft of a firearm from a federal firearms licensee - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 922(j) (possession of a stolen firearm - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1512(b)(3) (witness tampering - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	<b>:</b>	<b>Notice of Forfeiture</b>

**SUPERSEDING INDICTMENT**

**COUNTS ONE THROUGH THIRTY-EIGHT**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. The following businesses possessed a federal firearms license (“FFL”) and were authorized to deal in firearms under federal law:
  - a. Kayton Company, d/b/a Army&Navy Store, 1045 Grape Street, Whitehall, Pennsylvania 18052, FFL# 8-23-13438;

- b. Allan F. Boyer, d/b/a A.F. Boyer Hardware, 130 Main Street, Slatington, Pennsylvania, Pennsylvania 18080, FFL# 8-23-20371;
- c. Paul J. Keifer, d/b/a Keifer's Gun Shop, 401 Main Street, Walnutport, Pennsylvania 18088, FFL# 8-23-22269;
- d. Robert F. Litzenberger, d/b/a Golden Trigger Gun Shop, 358-B Main Street, Lower Level, Emmaus, Pennsylvania 18049, FFL# 8-23-39331;
- e. Lehigh Valley Indoor Shooters Association, d/b/a PLEOA Firing Line, 5581 Roosevelt Street, Whitehall, Pennsylvania 18052, FFL# 8-23-38928;
- f. Russell Jones, d/b/a Jones Gun Shop, 247 North 9th Street, Allentown, Pennsylvania 18102, FFL# 8-23-38464;
- g. Koehler International Inc., d/b/a Eagle Arms Sport Shop, 9331 Hamilton Boulevard, Breinigsville, Pennsylvania 18031, FFL# 8-23-20407;
- h. DPA Innovations Inc., d/b/a Defcon-1, 375 Hillton Road, Coopersburg, Pennsylvania 18036, FFL# 8-23-00940;
- i. David A. Zeller, Sr., d/b/a Zeller's Sporting Goods, 500 George Street, Throop, Pennsylvania 18512, FFL# 8-23-01269; and
- j. Edward Kennedy, d/b/a Ed's Sport Shop, 308 West Broad Street, Tamaqua, Pennsylvania 18252, FFL# 8-23-22070.

2. FFL holders were licensed, among other things, to sell firearms and ammunition. Various rules and regulations promulgated under the authority of Title 18, United States Code, Chapter 44 (Sections 921-929), govern the manner in which an FFL holder may sell firearms and ammunition.

3. The rules and regulations governing FFL holders required that a person seeking to purchase a handgun fill out a "Firearms Transaction Record," ATF Form 4473. Part of the Form 4473 required that the prospective purchaser certify truthfully, subject to penalties of perjury, that he or she was the actual buyer of the firearm. The Form 4473 contained language warning that "[t]he federal firearms laws require that the individual filling out this form must be buying the firearm for himself or as a gift. Any individual who is not buying the firearm for himself/herself or as a gift, but who completes this form, violates the law."

4. A person who purchases a firearm for another person and falsely completes the Form 4473 is a "straw purchaser." Acting as a straw purchaser is referred to as "lying and buying."

5. FFL holders were required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, to ensure that the person was not prohibited from purchasing a firearm.

6. Convicted felons were persons prohibited by law from buying firearms.

7. Defendant NASHAWN OMAR LAW was a convicted felon, who was prohibited by law from buying firearms.

8. Defendant NASHAWN OMAR LAW paid and offered to pay L.K., A.T., T.L., L.W., D.B., A.D., T.H., R.B., and H.K., persons known to the grand jury, to buy firearms for him.

9. On or about each of the dates specified in the chart below, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW**

knowingly made, and aided, abetted, and willfully caused, a false statement and representation to be made with respect to the information required to be kept in the records of a federally licensed firearms dealer, in connection with the acquisition of each of the firearms listed in the table below, from the federally licensed firearms dealers listed in the table below, in that, L.K., A.T., T.L., L.W., D.B., A.D., T.H., R.B., or H.K., persons known to the grand jury (“the straw purchasers”), at the direction of defendant LAW, falsely represented on Department of Treasury Form 4473, Firearms Transaction Record, that the straw purchasers listed in the table below were the actual buyers of the firearms listed in the table below, when in fact defendant NASHAWN OMAR LAW and the straw purchasers knew those representations to be false.

<b>COUNTS</b>	<b>DATE AND FFL</b>	<b>STRAW PURCHASER</b>	<b>FIREARM(S) PURCHASED</b>
1	March 22, 2003  Kayton Company, d/b/a, Army & Navy Store, 1045 Grape Street, Whitehall, Pennsylvania 18052, FFL# 8-23-13438	L.K.	1 Keltec, model P-11-B, 9mm x19 pistol, serial number 128310
2	May 4, 2003  Kayton Company, d/b/a, Army & Navy Store, 1045 Grape Street, Whitehall, Pennsylvania 18052, FFL# 8-23-13438	A.T.	1 Keltec, model P-11, 9mm x 19 pistol, serial number 129009
3	May 12, 2003  Paul J. Keifer, d/b/a Keifer’s Gun Shop, 401 Main Street Walnutport, Pennsylvania 18088 FFL# 8-23-22269	A.T.	1 Intratec, model CAT-9, 9mm pistol, serial number 05965

<b>COUNTS</b>	<b>DATE AND FFL</b>	<b>STRAW PURCHASER</b>	<b>FIREARM(S) PURCHASED</b>
4	May 12, 2003  Allan F. Boyer, d/b/a A.F. Boyer Hardware, 130 Main Street Slatington, Pennsylvania 18080 FFL# 8-23-20371	A.T.	1 Bryco, model 38, .32 caliber pistol, serial number 010360
5	May 12, 2003  Allan F. Boyer, d/b/a A.F. Boyer Hardware, 130 Main Street Slatington, Pennsylvania 18080 FFL# 8-23-20371	T.L.	1 Hi-Point, model JC, .40S&W caliber pistol, serial number 123124
6	May 22, 2003  Kayton Company, d/b/a, Army & Navy Store, 1045 Grape Street, Whitehall, Pennsylvania 18052, FFL# 8-23-13438	L.K.	1 Ruger, model P95D, 9mm x 19 pistol, serial number 314-60197
7	May 22, 2003  Kayton Company, d/b/a, Army & Navy Store, 1045 Grape Street, Whitehall, Pennsylvania 18052, FFL# 8-23-13438	L.K.	1 Taurus, model PT111SS, 9mm x 19 pistol, serial number TVJ81651

COUNTS	DATE AND FFL	STRAW PURCHASER	FIREARM(S) PURCHASED
8	<p>May 23, 2003</p> <p>Allan F. Boyer, d/b/a A.F. Boyer Hardware, 130 Main Street Slatington, Pennsylvania 18080 FFL# 8-23-20371</p>	L.K.	<p>1 Taurus, model PT140, .40S&amp;W caliber pistol, serial number SVE02147</p> <p>1 Standard Arms, model 9, 9mm pistol, serial number 02793</p> <p>1 Bersa, model Thunder, .380ACP caliber pistol, serial number 523259</p>
9	<p>May 30, 2003</p> <p>Allan F. Boyer, d/b/a A.F. Boyer Hardware, 130 Main Street Slatington, Pennsylvania 18080 FFL# 8-23-20371</p>	L.K.	<p>1 Stallard, model JS-9, 9mm pistol, serial number 049434</p> <p>1 Interarms, model Star, .45 caliber pistol, serial number 2061273</p>
10	<p>June 2, 2003</p> <p>Kayton Company, d/b/a, Army &amp; Navy Store, 1045 Grape Street, Whitehall, Pennsylvania 18052, FFL# 8-23-13438</p>	L.K.	1 Keltec, model P11HC, 9mm x 19 pistol, serial number 131908
11	<p>June 2, 2003</p> <p>Kayton Company, d/b/a, Army &amp; Navy Store, 1045 Grape Street, Whitehall, Pennsylvania 18052, FFL# 8-23-13438</p>	L.K.	1 Ruger, model P97D, .45ACP caliber pistol, serial number 663-50876

<b>COUNTS</b>	<b>DATE AND FFL</b>	<b>STRAW PURCHASER</b>	<b>FIREARM(S) PURCHASED</b>
12	<p>July 11, 2003</p> <p>Paul J. Keifer, d/b/a Keifer's Gun Shop, 401 Main Street Walnutport, Pennsylvania 18088 FFL# 8-23-22269</p>	L.K.	1 Sadius, model #509, 9mm pistol, serial number A003329
13	<p>July 26, 2003</p> <p>Robert J. Litzenberger, d/b/a Golden Trigger Gun Shop, 358-B Main Street, Lower Level Emmaus, Pennsylvania 18049 FFL# 8-23-39331</p>	L.K.	1 Ruger, model P95DC, 9mm pistol, serial number 313-49996
14	<p>April 27, 2004</p> <p>Kayton Company, d/b/a, Army &amp; Navy Store, 1045 Grape Street, Whitehall, Pennsylvania 18052, FFL# 8-23-13438</p>	L.W.	1 Ruger, model P95D, 9mm pistol, serial number 315-19213
15	<p>April 30, 2004</p> <p>Lehigh Valley Indoor Shooters Association, d/b/a PLEOA Firing Line, 5581 Roosevelt Street Whitehall, Pennsylvania 18052 FFL# 8-23-38928</p>	L.W.	1 AMT, model Back-Up, .45ACP caliber pistol, serial number DL19415
16	<p>May 3, 2004</p> <p>Koehler International Inc., d/b/a Eagle Arms Sport Shop 9331 Hamilton Boulevard Breinigsville, Pennsylvania 18031 FFL# 8-23-20407</p>	L.W.	1 Smith & Wesson, model SW9E Sigma, 9mm pistol, serial number PBD0725

<b>COUNTS</b>	<b>DATE AND FFL</b>	<b>STRAW PURCHASER</b>	<b>FIREARM(S) PURCHASED</b>
17	May 4, 2004  Koehler International Inc., d/b/a Eagle Arms Sport Shop 9331 Hamilton Boulevard Breinigsville, Pennsylvania 18031 FFL# 8-23-20407	L.W.	1 Cobra, model CA380, .380 caliber pistol, serial number CP011303  1 Llama, model Mini-Max, .45 caliber pistol, serial number 710406548-03
18	May 6, 2004  Kayton Company, d/b/a, Army & Navy Store, 1045 Grape Street, Whitehall, Pennsylvania 18052, FFL# 8-23-13438	L.W.	1 CZ, model CZ40B, .40S&W caliber pistol, serial number A3675
19	May 9, 2004  David A. Zeller, Sr., d/b/a Zeller's Sporting Goods, 500 George Street, Throop, Pennsylvania 18512, FFL# 8-23-01269	L.W.	1 Helwann (Century Arms), model 9mm, 9mm pistol, serial number 1163477  1 Firestorm, model 45 Govt, .45ACP caliber pistol, serial number 710412156-03
20	May 9, 2004  Edward Kennedy, d/b/a Ed's Sport Shop, 308 West Broad Street, Tamaqua, Pennsylvania 18252, FFL# 8-23-22070	L.W.	1 Astra, model A- 100, .45 caliber pistol, serial number W6887  1 Bersa, model 383A, .380 caliber pistol, serial number 281698



<b>COUNTS</b>	<b>DATE AND FFL</b>	<b>STRAW PURCHASER</b>	<b>FIREARM(S) PURCHASED</b>
21	September 11, 2004  Koehler International Inc., d/b/a Eagle Arms Sport Shop 9331 Hamilton Boulevard Breinigsville, Pennsylvania 18031 FFL# 8-23-20407	D.B.	1 HiPoint, model JHP, .45 caliber pistol, serial number X421142  1 HiPoint, model JCP, .40S&W caliber pistol, serial number X715362
22	September 11, 2004  Koehler International Inc., d/b/a Eagle Arms Sport Shop 9331 Hamilton Boulevard Breinigsville, Pennsylvania 18031 FFL# 8-23-20407	A.D.	1 HiPoint, model JHP, .45 caliber pistol, serial number X421120  1 HiPoint, model JCP, .40S&W caliber pistol, serial number X715363
23	September 17, 2004  Allan F. Boyer, d/b/a A.F. Boyer Hardware, 130 Main Street Slatington, Pennsylvania 18080 FFL# 8-23-20371	D.B.	1 Llama, model 40, .40S&W caliber pistol, serial number C03478  1 AMT, model Back-Up, .40S&W caliber pistol, serial number DLB03433
24	September 25, 2004  Kayton Company, d/b/a, Army & Navy Store, 1045 Grape Street, Whitehall, Pennsylvania 18052, FFL# 8-23-13438	D.B.	1 Taurus, model PT111, 9mm pistol, serial number TXE78600

<b>COUNTS</b>	<b>DATE AND FFL</b>	<b>STRAW PURCHASER</b>	<b>FIREARM(S) PURCHASED</b>
25	September 27, 2004  Koehler International Inc., d/b/a Eagle Arms Sport Shop 9331 Hamilton Boulevard Breinigsville, Pennsylvania 18031 FFL# 8-23-20407	D.B.	1 Keltec, model P-11, 9mm pistol, serial number A1H62  1 Rock Island, model M1911A1, .45 ACP caliber pistol, serial number RIA951652
26	February 17, 2005  Kayton Company, d/b/a, Army & Navy Store, 1045 Grape Street, Whitehall, Pennsylvania 18052, FFL# 8-23-13438	T.H.	1 Smith&Wesson, model SW9VE, 9mm pistol, serial number PBT8845
27	February 19, 2005  Russell Jones, d/b/a Jones Gun Shop 247 North 9th Street Allentown, Pennsylvania 18102 FFL# 8-23-38464	T.H.	1 Sturm Ruger, model P90, .45ACP caliber pistol, serial number 662-15489
28	February 19, 2005  Allan F. Boyer, d/b/a A.F. Boyer Hardware, 130 Main Street Slatington, Pennsylvania 18080 FFL# 8-23-20371	T.H.	1 Bersa, model Thunder 45, .45ACP pistol, serial number 575304
29	February 21, 2005  Kayton Company, d/b/a, Army & Navy Store, 1045 Grape Street, Whitehall, Pennsylvania 18052, FFL# 8-23-13438	T.H.	1 Ruger, model P97D, .45ACP caliber pistol, serial number 663-73161

<b>COUNTS</b>	<b>DATE AND FFL</b>	<b>STRAW PURCHASER</b>	<b>FIREARM(S) PURCHASED</b>
30	February 21, 2005  Lehigh Valley Indoor Shooters Association, d/b/a PLEOA Firing Line, 5581 Roosevelt Street Whitehall, Pennsylvania 18052 FFL# 8-23-38928	T.H.	1 Llama, model Mini-Max, .40S&W caliber pistol, serial number 71-04-07880-04
31	February 21, 2005  Koehler International Inc., d/b/a Eagle Arms Sport Shop 9331 Hamilton Boulevard Breinigsville, Pennsylvania 18031 FFL# 8-23-20407	T.H.	1 Taurus, model PT111, 9mm pistol, serial number TWG90543
32	February 23, 2005  Robert J. Litzenberger, d/b/a Golden Trigger Gun Shop, 358-B Main Street, Lower Level Emmaus, Pennsylvania 18049 FFL# 8-23-39331	T.H.	1 Taurus, model PT145 Millenium, .45ACP caliber pistol, serial number NXG99686
33	February 26, 2005  Kayton Company, d/b/a, Army & Navy Store, 1045 Grape Street, Whitehall, Pennsylvania 18052, FFL# 8-23-13438	T.H.	1 Taurus, model PT140, .40S&W caliber pistol, serial number SVG35659
34	February 27, 2005  Lehigh Valley Indoor Shooters Association, d/b/a PLEOA Firing Line, 5581 Roosevelt Street Whitehall, Pennsylvania 18052 FFL# 8-23-38928	T.H.	1 Taurus, model PT92AR, 9mm pistol, serial number TXC57568

<b>COUNTS</b>	<b>DATE AND FFL</b>	<b>STRAW PURCHASER</b>	<b>FIREARM(S) PURCHASED</b>
35	February 27, 2005  DPA Innovations Inc., d/b/a Defcon-1, 375 Hilltop Road Coopersburg, Pennsylvania 18036 FFL# 8-23-00940	T.H.	1 Ruger, model P95, 9mm pistol, serial number 315-49235
36	May 2, 2005  Kayton Company, d/b/a, Army & Navy Store, 1045 Grape Street, Whitehall, Pennsylvania 18052, FFL# 8-23-13438	R.B.	1 F.E.G., model P9R, 9mm pistol, serial number R54123
37	May 2, 2005  Kayton Company, d/b/a, Army & Navy Store, 1045 Grape Street, Whitehall, Pennsylvania 18052, FFL# 8-23-13438	R.B.	1 Ruger, model P90TH, .45ACP caliber pistol, serial number 662-44641
38	May 5 and 13, 2005  Kayton Company, d/b/a, Army & Navy Store, 1045 Grape Street, Whitehall, Pennsylvania 18052, FFL# 8-23-13438	H.K.	1 S&W, model SW9VE, 9mm pistol, serial number PBV8289
39	May 13, 2005  Lehigh Valley Indoor Shooters Association, d/b/a PLEOA Firing Line, 5581 Roosevelt Street Whitehall, Pennsylvania 18052 FFL# 8-23-38928	H.K.	1 Llama, Model Mini-Max 45, .45ACP pistol, serial number 71-04-12544-04
40	May 13, 2005  Allan F. Boyer, d/b/a A.F. Boyer Hardware, 130 Main Street Slatington, Pennsylvania 18080 FFL# 8-23-20371	H.K.	1 Taurus, Model PT111, 9mm pistol, serial number TXF91746

<b>COUNTS</b>	<b>DATE AND FFL</b>	<b>STRAW PURCHASER</b>	<b>FIREARM(S) PURCHASED</b>
41	May 24, 2005  Kayton Company, d/b/a, Army & Navy Store, 1045 Grape Street, Whitehall, Pennsylvania 18052, FFL# 8-23-13438	H.K.	1 Ruger, Model P90TH, .45ACP pistol, serial number 663-60849

All in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

## **COUNT FORTY-TWO**

### **THE GRAND JURY FURTHER CHARGES THAT:**

From on or about March 22, 2003 through on or about May 24, 2005, in the Eastern District of Pennsylvania, and elsewhere, defendant

### **NASHAWN OMAR LAW**

willfully engaged in the business of dealing in firearms, without being licensed to do so under the provisions of Chapter 44, Title 18 United States Code, by buying and selling to others approximately 50 firearms, that is:

- 1) a Keltec, model P-11-B, 9mm x19 pistol, serial number 128310;
- 2) a Keltec, model P-11, 9mm x 19 pistol, serial number 129009;
- 3) an Intratec, model CAT-9, 9mm pistol, serial number 05965;
- 4) a Bryco, model 38, .32 caliber pistol, serial number 010360;
- 5) a Hi-Point, model JC, .40S&W caliber pistol, serial number 123124;
- 6) a Ruger, model P95D, 9mm x 19 pistol, serial number 314-60197;
- 7) a Taurus, model PT111SS, 9mm x 19 pistol, serial number TVJ81651;
- 8) a Taurus, model PT140, .40S&W caliber pistol, serial number SVE02147;
- 9) a Standard Arms, model 9, 9mm pistol, serial number 02793;
- 10) a Bersa, model Thunder, .380ACP caliber pistol, serial number 523259;
- 11) a Stallard, model JS-9, 9mm pistol, serial number 049434;
- 12) an Interarms, model Star, .45 caliber pistol, serial number 2061273;
- 13) a Keltec, model P11HC, 9mm x 19 pistol, serial number 131908;
- 14) a Ruger, model P97D, .45ACP caliber pistol, serial number 663-50876;

- 15) a Sardius, model #509, 9mm pistol, serial number A003329;
- 16) a Ruger, model P95DC, 9mm pistol, serial number 313-49996;
- 17) a Ruger, model P95D, 9mm pistol, serial number 315-19213;
- 18) an AMT, model Back-Up, .45ACP caliber pistol, serial number DL19415;
- 19) a CZ, model 52, 7.62 caliber pistol, serial number G10974;
- 20) a Smith & Wesson, model SW9E Sigma, 9mm pistol, serial number PBD0725;
- 21) a Cobra, model CA380, .380 caliber pistol, serial number CP011303;
- 22) a Llama, model Mini-Max, .45 caliber pistol, serial number 710406548-03;
- 23) a CZ, model CZ40B, .40S&W caliber pistol, serial number A3675;
- 24) a Helwann (Century Arms), model 9mm, 9mm pistol, serial number 1163477;
- 25) a Firestorm, model 45 Govt, .45ACP caliber pistol, serial number 710412156-03;
- 26) an Astra, model A-100, .45 caliber pistol, serial number W6887;
- 27) a Bersa, model 383A, .380 caliber pistol, serial number 281698;
- 28) a HiPoint, model JHP, .45 caliber pistol, serial number X421142;
- 29) a HiPoint, model JCP, .40S&W caliber pistol, serial number X715362;
- 30) a HiPoint, model JHP, .45 caliber pistol, serial number X421120;
- 31) a HiPoint, model JCP, .40S&W caliber pistol, serial number X715363;
- 32) a Llama, model 40, .40S&W caliber pistol, serial number C03478;

- 33) an AMT, model Back-Up, .40S&W caliber pistol, serial number DLB03433;
- 34) a Taurus, model PT111, 9mm pistol, serial number TXE78600;
- 35) a Keltec, model P-11, 9mm pistol, serial number A1H62;
- 36) a Rock Island, model M1911A1, .45 ACP caliber pistol, serial number RIA951652;
- 37) a Smith&Wesson, model SW9VE, 9mm pistol, serial number PBT8845;
- 38) a Sturm Ruger, model P90, .45ACP caliber pistol, serial number 662-15489;
- 39) a Bersa, model Thunder 45, .45ACP pistol, serial number 575304;
- 40) a Ruger, model P97D, .45ACP caliber pistol, serial number 663-73161;
- 41) a Llama, model Mini-Max, .40S&W caliber pistol, serial number 71-04-07880-04;
- 42) a Taurus, model PT111, 9mm pistol, serial number TWG90543;
- 43) a Taurus, model PT145 Millenium, .45ACP caliber pistol, serial number NXG99686;
- 44) a Taurus, model PT140, .40S&W caliber pistol, serial number SVG35659;
- 45) a Taurus, model PT92AR, 9mm pistol, serial number TXC57568;
- 46) a Ruger, model P95, 9mm pistol, serial number 315-49235;
- 47) a S&W, model 40VE, .40S&W caliber pistol, serial number PBU8114;
- 48) a F.E.G., model P9R, 9mm pistol, serial number R54123;
- 49) a Ruger, model P90TH, .45ACP caliber pistol, serial number 662-44641;



- 50) a S&W, model SW9VE, 9mm pistol, serial number PBV8289;
- 51) a Llama, model Mini-Max 45, .45ACP pistol, serial number 71-04-12544-04;
- 52) a Taurus, model PT111, 9mm pistol, serial number TXF91746, and;
- 53) a Ruger, model P90TH, .45ACP pistol, serial number 663-60849,

In violation of Title 18, United States Code, Section 922(a)(1)(A).

**COUNT FORTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

\_\_\_\_\_ From on or about March 22, 2003 through on or about May 24, 2005, in the Eastern District of Pennsylvania, and elsewhere, defendant

**NASHAWN OMAR LAW,**

while engaged in the business of dealing in firearms without a license, willfully transported the firearms listed below, which moved from Pennsylvania to New Jersey in interstate commerce,

- 1) a Keltec, model P-11-B, 9mm x19 pistol, serial number 128310;
- 2) a Keltec, model P-11, 9mm x 19 pistol, serial number 129009;
- 3) an Intratec, model CAT-9, 9mm pistol, serial number 05965;
- 4) a Bryco, model 38, .32 caliber pistol, serial number 010360;
- 5) a Hi-Point, model JC, .40S&W caliber pistol, serial number 123124;
- 6) a Ruger, model P95D, 9mm x 19 pistol, serial number 314-60197;
- 7) a Taurus, model PT111SS, 9mm x 19 pistol, serial number TVJ81651;
- 8) a Taurus, model PT140, .40S&W caliber pistol, serial number SVE02147;
- 9) a Standard Arms, model 9, 9mm pistol, serial number 02793;
- 10) a Bersa, model Thunder, .380ACP caliber pistol, serial number 523259;
- 11) a Stallard, model JS-9, 9mm pistol, serial number 049434;
- 12) an Interarms, model Star, .45 caliber pistol, serial number 2061273;
- 13) a Keltec, model P11HC, 9mm x 19 pistol, serial number 131908;
- 14) a Ruger, model P97D, .45ACP caliber pistol, serial number 663-50876;
- 15) a Sardius, model #509, 9mm pistol, serial number A003329;

- 16) a Ruger, model P95DC, 9mm pistol, serial number 313-49996;
- 17) a Ruger, model P95D, 9mm pistol, serial number 315-19213;
- 18) an AMT, model Back-Up, .45ACP caliber pistol, serial number DL19415;
- 19) a CZ, model 52, 7.62 caliber pistol, serial number G10974
- 20) a Smith & Wesson, model SW9E Sigma, 9mm pistol, serial number PBD0725;
- 21) a Cobra, model CA380, .380 caliber pistol, serial number CP011303;
- 22) a Llama, model Mini-Max, .45 caliber pistol, serial number 710406548-03;
- 23) a CZ, model CZ40B, .40S&W caliber pistol, serial number A3675;
- 24) a Helwann (Century Arms), model 9mm, 9mm pistol, serial number 1163477;
- 25) a Firestorm, model 45 Govt, .45ACP caliber pistol, serial number 710412156-03;
- 26) an Astra, model A-100, .45 caliber pistol, serial number W6887;
- 27) a Bersa, model 383A, .380 caliber pistol, serial number 281698;
- 28) a HiPoint, model JHP, .45 caliber pistol, serial number X421142;
- 29) a HiPoint, model JCP, .40S&W caliber pistol, serial number X715362;
- 30) a HiPoint, model JHP, .45 caliber pistol, serial number X421120;
- 31) a HiPoint, model JCP, .40S&W caliber pistol, serial number X715363;
- 32) a Llama, model 40, .40S&W caliber pistol, serial number C03478;

- 33) an AMT, model Back-Up, .40S&W caliber pistol, serial number DLB03433;
- 34) a Taurus, model PT111, 9mm pistol, serial number TXE78600;
- 35) a Keltec, model P-11, 9mm pistol, serial number A1H62;
- 36) a Rock Island, model M1911A1, .45 ACP caliber pistol, serial number RIA951652;
- 37) a Smith&Wesson, model SW9VE, 9mm pistol, serial number PBT8845;
- 38) a Sturm Ruger, model P90, .45ACP caliber pistol, serial number 662-15489;
- 39) a Bersa, model Thunder 45, .45ACP pistol, serial number 575304;
- 40) a Ruger, model P97D, .45ACP caliber pistol, serial number 663-73161;
- 41) a Llama, model Mini-Max, .40S&W caliber pistol, serial number 71-04-07880-04;
- 42) a Taurus, model PT111, 9mm pistol, serial number TWG90543;
- 43) a Taurus, model PT145 Millenium, .45ACP caliber pistol, serial number NXG99686;
- 44) a Taurus, model PT140, .40S&W caliber pistol, serial number SVG35659;
- 45) a Taurus, model PT92AR, 9mm pistol, serial number TXC57568;
- 46) a Ruger, model P95, 9mm pistol, serial number 315-49235;
- 47) a S&W, model 40VE, .40S&W caliber pistol, serial number PBU8114;
- 48) a F.E.G., model P9R, 9mm pistol, serial number R54123;
- 49) a Ruger, model P90TH, .45ACP caliber pistol, serial number 662-44641;

50) a S&W, model SW9VE, 9mm pistol, serial number PBV8289; and

51) a Taurus, model PT111, 9mm pistol, serial number TXF91746.

In violation of Title 18, United States Code, Section 922(a)(1)(A).

**COUNT FORTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 22, 2003, in Whitehall, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Keltec, model P-11-B, 9mm x19 pistol, serial number 128310.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FORTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 4, 2003, in Whitehall, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Keltec, model P-11, 9mm x 19 pistol, serial number 129009.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FORTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 12, 2003, in Walnutport, Slatington, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, an Intratec, model CAT-9, 9mm pistol, serial number 05965; a Bryco, model 38, .32 caliber pistol, serial number 010360; and a Hi-Point, model JC, .40S&W caliber pistol, serial number 123124.

In violation of Title 18, United States Code, Section 922(g)(1).



**COUNT FORTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 12, 2003, in Allentown, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW**

knowingly possessed a firearm, that is, an Intratec, model CAT-9, 9mm pistol, serial number 05965; a Bryco, model 38, .32 caliber pistol, serial number 010360; and a Hi-Point, model JC, .40S&W caliber pistol, serial number 123124, from which he had removed, obliterated, and altered the serial number, and which had been shipped in interstate commerce.

In violation of Title 18, United States Code, Section 922(k).

**COUNT FORTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 22, 2003, in Whitehall, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Ruger, model P95D, 9mm x 19 pistol, serial number 314-60197, and a Taurus, model PT111SS, 9mm x 19 pistol, serial number TVJ81651.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FORTY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 23, 2003, in Slatington, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Taurus, model PT140, .40S&W caliber pistol, serial number SVE02147; a Standard Arms, model 9, 9mm pistol, serial number 02793; and, a Bersa, model Thunder, .380ACP caliber pistol, serial number 523259,

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FIFTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 30, 2003, in Slatington, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Stallard, model JS-9, 9mm pistol, serial number 049434, and an Interarms, model Star, .45 caliber pistol, serial number 2061273.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FIFTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 2, 2003, in Whitehall, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Keltec, model P11HC, 9mm x 19 pistol, serial number 131908, and a Ruger, model P97D, .45ACP caliber pistol, serial number 663-50876.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FIFTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 11, 2003, in Walnutport, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Sardius, model #509, 9mm pistol, serial number A003329.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FIFTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

\_\_\_\_\_ On or about July 26, 2003, in Emmaus, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Ruger, model P95DC, 9mm pistol, serial number 313-49996.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FIFTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 27, 2004, in Whitehall, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Ruger, model, P95D, 9mm pistol, serial number 315-19213.

In violation of Title 18, United States Code, Section 922(g)(1).



**COUNT FIFTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about April 30, 2004, Lehigh Valley Indoor Shooters Association, d/b/a PLEOA Firing Line (“PLEOA Firing Line”), 5581 Roosevelt Street, Whitehall, Pennsylvania 18052, FFL# 8-23-38928, was licensed to engage in the business of dealing in firearms.

2. On or about April 30, 2004, a CZ, model 52, 7.62 caliber pistol, serial number G10974, was in the business inventory of PLEOA Firing Line.

3. On or about April 30, 2004, Whitehall, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW**

stole and unlawfully took and carried away from the premises of PLEOA Firing Line a firearm, that is, a CZ, model 52, 7.62 caliber pistol, serial number G10974, which had been shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Section 922(u).

**COUNT FIFTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 30, 2004, in Whitehall, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, an AMT, model Back-Up, .45ACP caliber pistol, serial number DL19415, and a CZ, model 52, 7.62 caliber pistol, serial number G10974.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FIFTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 3, 2004, in Breinigsville, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Smith & Wesson, model SW9E, Sigma, 9mm pistol, serial number PBD0725.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FIFTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 4, 2004, in Breinigsville, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Cobra, model CA380, .380 caliber pistol, serial number CP011303, and a Llama, model Mini-Max, .45 caliber pistol, serial number 710406548-03.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FIFTY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 6, 2004, in Whitehall, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a CZ, model CZ40B, .40S&W caliber pistol, serial number A3675.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SIXTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 9, 2004, in Whitehall, Tamaqua, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Helwann (Century Arms), model 9mm, 9mm pistol, serial number 1163477, a Firestorm, model 45 Govt, .45ACP caliber pistol, serial number 710412156-03, an Astra, model A-100, .45 caliber pistol, serial number W6887, and a Bersa, model 383A, .380 caliber pistol, serial number 281698.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SIXTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 11, 2004, in Breinigsville, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a HiPoint, model JHP, .45 caliber pistol, serial number X421142, a HiPoint, model JCP, .40S&W caliber pistol, serial number X715362, a HiPoint, model JHP, .45 caliber pistol, serial number X421120, and a HiPoint, model JCP, .40S&W caliber pistol, serial number X715363.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SIXTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 17, 2004, in Slatington, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Llama, model 40, .40S&W caliber pistol, serial number C03478, and an AMT, model Back-Up, .40S&W caliber pistol, serial number DLB03433.

In violation of Title 18, United States Code, Section 922(g)(1).



**COUNT SIXTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 25, 2004, in Whitehall, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Taurus, model PT111, 9mm pistol, serial number TXE78600.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SIXTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 27, 2004, in Breinigsville, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Keltec, model P-11, 9mm pistol, serial number A1H62, and a Rock Island, model M1911A1, .45 ACP caliber pistol, serial number RIA951652.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SIXTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 17, 2005, in Whitehall, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Smith&Wesson, model SW9VE, 9mm pistol, serial number PBT8845.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SIXTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 19, 2005, in Allentown, Slatington, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Sturm Ruger, model P90, .45ACP caliber pistol, serial number 662-15489, and a Bersa, model Thunder 45, .45ACP pistol, serial number 575304.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SIXTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 21, 2005, in Whitehall, Breinigsville, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Ruger, model P97D, .45ACP caliber pistol, serial number 663-73161; a Llama, model Mini-Max, .40S&W caliber pistol, serial number 71-04-07880-04; and a Taurus, model PT111, 9mm pistol, serial number TWG90543.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SIXTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 23, 2005, in Emmaus, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Taurus, model PT145 Millenium, .45ACP caliber pistol, serial number NXG99686.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SIXTY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 26, 2005, in Whitehall, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Taurus, model PT140, .40S&W caliber pistol, serial number SVG35659.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SEVENTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 27, 2005, in Whitehall, Coopersburg, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Taurus, model PT92AR, 9mm pistol, serial number TXC57568, and a Ruger, model P95, 9mm pistol, serial number 315-49235.

In violation of Title 18, United States Code, Section 922(g)(1).



**COUNT SEVENTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 20, 2005, in Allentown, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a S&W, model 40VE, .40S&W caliber pistol, serial number PBU8114.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SEVENTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 20, 2005, in Allentown, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW**

knowingly possessed a stolen firearm, that is, a S&W, model 40VE, .40S&W caliber pistol, serial number PBU8114, which had been shipped and transported in interstate commerce before it was stolen, knowing and having reasonable cause to believe the firearm was stolen.

In violation of Title 18, United States Code, Section 922(j).

**COUNT SEVENTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 2, 2005, in Whitehall, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, an F.E.G., model P9R, 9mm pistol, serial number R54123 and a Ruger, model P90TH, .45ACP caliber pistol, serial number 662-44641.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SEVENTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 13, 2005, in Whitehall, Slatington, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a S&W, model SW9VE, 9mm pistol, serial number PBV8289, a Llama, model Mini-Max 45, .45ACP pistol, serial number 71-04-12544-04, and a Taurus, model PT111, 9mm pistol, serial number TXF91746.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SEVENTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 24, 2005, in Whitehall, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Ruger, model P90TH, .45ACP pistol, serial number 663-60849

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SEVENTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 28, 2005, in Allentown, and elsewhere, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW,**

having been convicted in a court of the Commonwealth of Virginia of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Ruger, model P90TH, .45ACP pistol, serial number 663-60849, and a Llama, model Mini-Max 45, .45ACP pistol, serial number 71-04-12544-04.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SEVENTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about July 30, 2003, special agents of the Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF), that is, law enforcement officers of the United States, interviewed A.T. about A.T.'s purchase of the firearms listed in Counts Two through Four of the indictment, and on July 31, 2003, ATF opened an investigation of possible violations of Title 18, United States Code, Section 924(a)(1)(A) (making a false statement to a federal firearms licensee) in connection with the purchase of these firearms.

2. On or about April 27, 2005, ATF special agents interviewed defendant NASHAWN OMAR LAW in connection with the ongoing investigation referred to in paragraph 1 of this count. In this interview, defendant LAW admitted that he was a convicted felon; that he, therefore, could not purchase firearms; that he was aware that federal agents had interviewed A.T. about A.T.'s purchase of firearms; that he knew "straw purchasing" is a federal offense; and that he had accompanied the purchasers of the firearms listed in Counts One through Thirty-Five to the respective firearms dealers from whom the firearms listed in those counts were purchased.

3. On or about May 28, 2005, officers and detectives of the Allentown Police Department arrested defendant NASHAWN OMAR LAW and charged him with the illegal possession of the firearms listed in Counts Thirty-Nine and Forty-One.

4. On or about May 29, 2005, defendant NASHAWN OMAR LAW asked H.K., a person known to the grand jury, falsely to report that the firearms listed in Counts Thirty-Nine and Forty-One, which she had purchased for defendant LAW, were hers; that on May 28, 2005, H.K. and defendant LAW were going to a shooting range; that H.K. got sick and asked defendant

LAW to drop her at her house; and that H.K. left the firearms in the van defendant LAW was driving.

5. On or about May 29, 2005, in Allentown, in the Eastern District of Pennsylvania, defendant

**NASHAWN OMAR LAW**

knowingly corruptly persuaded and attempted to corruptly persuade another person, H.K., known to the grand jury, with the intent to hinder, delay, or prevent the communication to a law enforcement officer of the United States of information relating to the commission or possible commission of a federal offense, that is, making a false statement to a federal firearms licensee, in violation of Title 18, United States Code, Section 924(a)(1)(A), and possession of a firearm by a convicted felon, in violation of Title 18, United States Code, Section 922(g)(1).

In violation of Title 18, United States Code, Section 1512(b)(3).



**NOTICE OF FORFEITURE (18 U.S.C. § 924(d))**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Sections 924(a)(1)(A), 922(a)(1)(A), 922(g)(1), and 922(k), and 922(u), set forth in this indictment, defendant

**NASHAWN OMAR LAW**

shall forfeit to the United States of America the firearms involved in the commission of these offenses, including, but not limited to:

- 1) a Keltec, model P-11-B, 9mm x19 pistol, serial number 128310;
- 2) a Keltec, model P-11, 9mm x 19 pistol, serial number 129009;
- 3) an Intratec, model CAT-9, 9mm pistol, serial number 05965;
- 4) a Bryco, model 38, .32 caliber pistol, serial number 010360;
- 5) a Hi-Point, model JC, .40S&W caliber pistol, serial number 123124;
- 6) a Ruger, model P95D, 9mm x 19 pistol, serial number 314-60197;
- 7) a Taurus, model PT111SS, 9mm x 19 pistol, serial number TVJ81651;
- 8) a Taurus, model PT140, .40S&W caliber pistol, serial number SVE02147;
- 9) a Standard Arms, model 9, 9mm pistol, serial number 02793;
- 10) a Bersa, model Thunder, .380ACP caliber pistol, serial number 523259;
- 11) a Stallard, model JS-9, 9mm pistol, serial number 049434;
- 12) an Interarms, model Star, .45 caliber pistol, serial number 2061273;
- 13) a Keltec, model P11HC, 9mm x 19 pistol, serial number 131908;
- 14) a Ruger, model P97D, .45ACP caliber pistol, serial number 663-50876;

- 15) a Sardius, model #509, 9mm pistol, serial number A003329;
- 16) a Ruger, model P95DC, 9mm pistol, serial number 313-49996;
- 17) a Ruger, model P95D, 9mm pistol, serial number 315-19213;
- 18) an AMT, model Back-Up, .45ACP caliber pistol, serial number DL19415;
- 19) a CZ, model 52, 7.62 caliber pistol, serial number G10974;
- 20) a Smith & Wesson, model SW9E Sigma, 9mm pistol, serial number PBD0725;
- 21) a Cobra, model CA380, .380 caliber pistol, serial number CP011303;
- 22) a Llama, model Mini-Max, .45 caliber pistol, serial number 710406548-03;
- 23) a CZ, model CZ40B, .40S&W caliber pistol, serial number A3675;
- 24) a Helwann (Century Arms), model 9mm, 9mm pistol, serial number 1163477;
- 25) a Firestorm, model 45 Govt, .45ACP caliber pistol, serial number 710412156-03;
- 26) an Astra, model A-100, .45 caliber pistol, serial number W6887;
- 27) a Bersa, model 383A, .380 caliber pistol, serial number 281698;
- 28) a HiPoint, model JHP, .45 caliber pistol, serial number X421142;
- 29) a HiPoint, model JCP, .40S&W caliber pistol, serial number X715362;
- 30) a HiPoint, model JHP, .45 caliber pistol, serial number X421120;
- 31) a HiPoint, model JCP, .40S&W caliber pistol, serial number X715363;
- 32) a Llama, model 40, .40S&W caliber pistol, serial number C03478;

- 33) an AMT, model Back-Up, .40S&W caliber pistol, serial number DLB03433;
- 34) a Taurus, model PT111, 9mm pistol, serial number TXE78600;
- 35) a Keltec, model P-11, 9mm pistol, serial number A1H62;
- 36) a Rock Island, model M1911A1, .45 ACP caliber pistol, serial number RIA951652;
- 37) a Smith&Wesson, model SW9VE, 9mm pistol, serial number PBT8845;
- 38) a Sturm Ruger, model P90, .45ACP caliber pistol, serial number 662-15489;
- 39) a Bersa, model Thunder 45, .45ACP pistol, serial number 575304;
- 40) a Ruger, model P97D, .45ACP caliber pistol, serial number 663-73161;
- 41) a Llama, model Mini-Max, .40S&W caliber pistol, serial number 71-04-07880-04;
- 42) a Taurus, model PT111, 9mm pistol, serial number TWG90543;
- 43) a Taurus, model PT145 Millenium, .45ACP caliber pistol, serial number NXG99686;
- 44) a Taurus, model PT140, .40S&W caliber pistol, serial number SVG35659;
- 45) a Taurus, model PT92AR, 9mm pistol, serial number TXC57568;
- 46) a Ruger, model P95, 9mm pistol, serial number 315-49235;
- 47) a S&W, model 40VE, .40S&W caliber pistol, serial number PBU8114;
- 48) a F.E.G., model P9R, 9mm pistol, serial number R54123;
- 49) a Ruger, model P90TH, .45ACP caliber pistol, serial number 662-44641;

- 50) a S&W, model SW9VE, 9mm pistol, serial number PBV8289;
- 51) a Llama, model Mini-Max 45, .45ACP pistol, serial number 71-04-12544-04;
- 52) a Taurus, model PT111, 9mm pistol, serial number TXF91746, and;
- 53) a Ruger, model P90TH, .45ACP pistol, serial number 663-60849.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

**TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**PATRICK L. MEEHAN**  
**UNITED STATES ATTORNEY**